

**REMARKS/ARGUMENTS**

Prior to the entry of this Amendment, claims 1-37 were pending in this application. No claims have been amended, no claims have been canceled, and no claims have been added herein. Therefore, claims 1-37 remain pending in this application. Applicant respectfully requests reconsideration of these claims for at least the reasons presented below.

**35 U.S.C. § 102 Rejection, Mullins**

The Office Action has rejected claims 1, 10-13, 21, 24, 26-28, 31 and 33-35 under 35 U.S.C. § 102(e) as being anticipated by U. S. Patent No. 6,985,912 to Mullins et al. (hereinafter “Mullins”). The Applicant respectfully submits the following arguments pointing out significant differences between claims 1, 10-13, 21, 24, 26-28, 31 and 33-35 submitted by the Applicant and Mullins.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” MPEP 2131 citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicant respectfully argues that Mullins fails to disclose each and every claimed element. For example, Mullins fails to disclose, either expressly or inherently, receiving a request to access data for one or more attributes, said request includes said attributes in a first data format. Mullins also does not disclose translating at least a portion of the request or providing the translated request to the relational database.

As noted previously, Mullins “relates in general to enhancing database access and performance when correlating or translating one database to another database or to an object programming application.” (Col. 1, lines 13-16) Mullins references “a mapping system for handling data requested by an object software application model in a manner that is compatible with relational data stores.” (Col. 7, lines 28-31) “The mapping information can be used to map from objects to relational models or vice versa, objects to objects, object to COBAL or vice

versa, and object to XML and the like." (Col. 7, lines 41-44) More specifically, Mullins describes a mapping system that includes "data in the first database format stored in the system; rules for translating from the first format to the second format stored as a separate structure from the data; and means for applying the rules to the data to obtain the second format." (Col. 13, lines 13-17) That is, the rules of Mullins define the relationships between the objects and the database. (Col. 13, lines 40-48) Mullins does not disclose receiving a request to access data for one or more attributes, said request includes said attributes in a first data format. Rather, the attributes discussed in Mullins are attributes of objects which comprise the map. Mullins does not disclose a request that includes these or other attributes.

In response to this argument, the Office Action cites and quotes Col. 13, lines 9-18 of Mullins which states:

"In another embodiment the invention provides a system for mapping from a first database format to a second database format, or from one database to another database of the same type, as a way for transferring data or synchronizing data sources. The system includes: data in the first database format stored in the system; rules for translating from the first format to the second format stored as a separate structure from the data; and means for applying the rules to the data to obtain the second format."

The Office Action goes on to argue:

"The preceding text clearly indicates that the first database format includes attributes in the first data format. That is the attributes that are stored in the data store (i.e., database), the request (**i.e., data requested**) includes attributes in the first data format (i.e. first database format)." (Office Action p. 20-21, emphasis added)

The Applicants respectfully submit that this reading of Mullins actually supports the argument that Mullins does not teach a request that includes the attributes to be translated. Rather, as the Office Action points out, attributes are stored in the data store and the data requested (i.e., the data in the data store) includes the attributes. That is, the data requested, not the request itself, includes the attributes. Furthermore, Mullins does not disclose translating at least a portion of the request or providing the translated request to the relational database. That

is, since the requested data, i.e., the data in the data store, includes the attributes, it is the data in the data store, the stored data object, that is translated under Mullins, not the request itself or a portion thereof.

Claim 1, upon which claims 2-12 depend, claim 13, upon which claims 14-20 depend, and claim 21, upon which claims 22 and 23 depend, each recite in part receiving a request to access data for one or more attributes, said request includes said attributes in a first data format, accessing a mapping catalog customizable for a relational database schema, said mapping catalog identifies one or more portions of one or more tables in a relational database that stores said data for said one or more attributes and a classification for each of the one or more of the attributes, said relational database corresponds to said relational database schema, translating at least a portion of said request from said first data format to a form suitable for said relational database, said step of translating is based on said classification of each attribute.

Mullins does not disclose receiving a request to access data for one or more attributes, said request identifies said attributes in a first data format. Rather, the attributes discussed in Mullins and cited by the Office Action are attributes of objects which comprise the map. Furthermore, Mullins does not disclose translating at least a portion of the request or providing the translated request to the relational database. Rather, Mullins teaches translating data stored in the system, i.e., a stored data object.

Similarly, claim 24, upon which claims 25-30 depend, and claim 31, upon which claims 32-37 depend, both recite in part a mapping catalog identifying one or more portions of one or more tables in a relational database that stores data for one or more attributes and a classification for each of the one or more attributes; and a translation module receiving access request information from said data source interface and mapping information from said mapping catalog, said access request information pertains to data for the one or more attributes, said translation module translates said request information from a first form to a second form suitable for the relational database based on said mapping information from said mapping catalog including said classification. Mullins does not disclose a translation module receiving access request information from said data source interface and mapping information from said mapping

catalog, said access request information pertains to data for the one or more attributes. Rather, the attributes discussed in Mullins and cited by the Office Action are attributes of objects which comprise the map. Furthermore, Mullins does not disclose translating request information. Rather, Mullins teaches translating data stored in the system, i.e., a stored data object.

For at least the previous reasons, claims 1, 10-13, 21, 24, 26-28, 31 and 33-35 are thought to be patentable over Mullins. Therefore, Applicant respectfully request withdrawal of the rejection and allowance of the claims.

**35 U.S.C. § 103 Rejection, Mullins in view of Durand**

The Office Action has rejected claims 2, 3, 5, 6, 14, 15, 17, 25, 29, 32 and 36 under 35 U.S.C. § 103(a) as being unpatentable over Mullins in view of U. S. Patent No. 5,694,598 to Durand et al. (hereinafter "Durand"). Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claims 2, 3, 5, 6, 14, 15, 17, 25, 29, 32 and 36 each depend upon a base claim that is thought to be allowable as discussed in detail above.

**35 U.S.C. § 103 Rejection, Mullins in view of Bachmann**

The Office Action has rejected claims 4, 16, 30, and 37 under 35 U.S.C. § 103(a) as being unpatentable over Mullins in view of U. S. Patent No. 6,085, 188 to Bachmann et al. (hereinafter "Bachmann"). Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claims 4, 16, 30, and 37 each depend upon a base claim that is thought to be allowable as discussed in detail above.

**35 U.S.C. § 103 Rejection, Mullins in view of Shen**

The Office Action has rejected claims 7-9 and 18-20 under 35 U.S.C. § 103(a) as being unpatentable over Mullins in View of U. S. Patent No. 5,596,746 to Shen et al. (hereinafter "Shen"). Applicant respectfully requests withdrawal of the rejection and allowance of the claims

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for at least the reason that claims 7-9 and 18-20 each depend upon a base claim that is thought to be allowable as discussed in detail above.

**35 U.S.C. § 103 Rejection, Mullins in view of Durand and further in view of Bachmann**

The Office Action has rejected claim 22 under 35 U.S.C. § 103(a) as being unpatentable over Mullins in view of Durand and further in view of Bachmann. Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claim 22 depends upon a base claim that is thought to be allowable as discussed in detail above.

**CONCLUSION**

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

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Respectfully submitted,

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